

**IN THE SUPERIOR COURT OF GWINNETT COUNTY  
STATE OF GEORGIA**

**PRIMROSE CREEK HOA,**

**Plaintiff,**

**vs.**

**PHILADELPHIA INDEMNITY  
INSURANCE COMPANY,**

**Defendant.**

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**CIVIL ACTION FILE NO.:  
23-A-02900-2**

**NOTICE OF FILING NOTICE OF REMOVAL**

To: Tiana P. Garner  
Clerk, Superior Court of Gwinnett County  
75 Langley Drive  
Lawrenceville, GA 30046

J. Remington Huggins  
Michael D. Turner  
The Huggins Law Firm, LLC  
110 Norcross Street  
Roswell, GA 30075

You are hereby notified of the filing of a Notice of Removal to the United States District Court for the Northern District of Georgia, Atlanta Division, of the case of Primrose Creek HOA v. Philadelphia Indemnity Insurance Company, Civil Action No. 23-A-02900-2 in the Superior Court of Gwinnett County, in accordance with the provisions of Section 1331, Title 28 of the United States Code. Copies of said Notice filed are attached hereto.

Respectfully submitted this 28<sup>th</sup> day of April, 2023.

CHARTWELL LAW, LLP

/s/ Karen K. Karabinos

Karen K. Karabinos  
Georgia Bar No. 423906

/s/ Katelyn E. Fischer

Katelyn E. Fischer

3200 Cobb Galleria Pkwy.  
Bldg. 200, Ste. 250  
Atlanta, GA 30339  
Direct (470) 660-8737  
Main (404) 410-1151  
Fax (850) 668-7972  
[kkarabinos@chartwelllaw.com](mailto:kkarabinos@chartwelllaw.com)  
[kfischer@chartwelllaw.com](mailto:kfischer@chartwelllaw.com)

Georgia Bar No. 491302

*Counsel for PIIC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served a copy of the within and forgoing  
**DEFENDANT'S NOTICE OF FILING NOTICE OF REMOVAL TO FEDERAL COURT**  
upon all parties to this matter by utilizing the Court's e-filing system, which will automatically  
remit a copy of the within and foregoing to counsel of record as follows:

**J. Remington Huggins  
Michael D. Turner  
The Huggins Law Firm, LLC  
110 Norcross Street  
Roswell, GA 30075  
remington@lawhuggins.com  
[mdturner@lawhuggins.com](mailto:mdturner@lawhuggins.com)**

This 28th day of April, 2023.

CHARTWELL LAW, LLP

/s/ Karen K. Karabinos  
Karen K. Karabinos  
Georgia Bar No. 423906

*Counsel for PIIC*

3200 Cobb Galleria Pkwy.  
Bldg. 200, Ste. 250  
Atlanta, GA 30339  
Direct (470) 660-8737  
Main (404) 410-1151  
Fax (850) 668-7972  
[kkarabinos@chartwelllaw.com](mailto:kkarabinos@chartwelllaw.com)